

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

GREATER BOSTON LEGAL SERVICES, *et al.*,

Plaintiffs,

v.

UNITED STATES DEPARTMENT OF HOMELAND
SECURITY, *et al.*

Defendants.

**JOINT STATUS REPORT
AND PROPOSED BRIEFING
SCHEDULE**

Case No.: 1:21-cv-10083-DJC

JOINT STATUS REPORT AND PROPOSED BRIEFING SCHEDULE

Pursuant to the Court’s Minute Order of August 12, 2024, ECF No. 126, the Parties to the above-captioned action submit this joint statement regarding the completion of discovery and proposed briefing schedule for the Parties’ anticipated cross-motions for summary judgment. In accordance with the Court’s Minute Order, the Parties submit that:

1. All three depositions, as well as the written discovery, authorized by the Court’s Order permitting limited discovery as to Plaintiff’s remaining claim arising under the Administrative Procedure Act (“APA”), ECF No. 115, have now been completed.

2. Following the completion of discovery, counsel for the Parties conferred regarding appropriate next steps in this case in order to present their remaining disputes in the most efficient manner possible for the Court’s resolution, including by email and teleconference on August 21, 2024.

3. The Parties agree that this case may be resolved by cross-motions for summary judgment on the basis of the administrative record as supplemented by the discovery conducted in accordance with the Court’s Minute Order of February 2, 2024.

4. Further, Plaintiffs are considering filing a motion for leave to file an Amended Complaint to add one or more additional Plaintiffs. The Parties are meeting and conferring concerning the need for this potential amendment, and Defendants reserve their rights to file an opposition to any such motion.

5. The Parties therefore respectfully request that the Court approve and enter the following summary judgment briefing schedule, pursuant to L.R. 16.1(d)(2) and the Court's Minute Order of August 12, 2024:

October 15, 2024	Deadline for Plaintiffs to file Motion for Leave to Amend Complaint;
November 15, 2024	Deadline for Plaintiffs to file Motion for Summary Judgment, not to exceed 30 pages;
December 16, 2024	Deadline for Defendants to file combined Cross-Motion for Summary Judgment and Response to Plaintiffs' Motion for Summary Judgment, not to exceed 30 pages;
January 15, 2025	Deadline for Plaintiffs to file combined Response to Cross-Motion for Summary Judgment and Reply in Support of Motion for Summary Judgment, not to exceed 20 pages;
February 12, 2025	Deadline for Defendants to file Reply in Support of Cross-Motion for Summary Judgment, not to exceed 20 pages;

WHEREFORE, the Parties respectfully submit this joint status report and request entry of the above briefing schedule in order to facilitate resolution of Plaintiffs' remaining APA claim.

September 6, 2024

Respectfully submitted,

/s/ Adriana Lafaille

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